

EXHIBIT A

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbuton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA Electronic Mail

February 6, 2018

ALL DEFENSE COUNSEL
PER ATTACHED LISTRe: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Counsel:

As you will recall, during the January 24, 2018 telephone conference, Judge Netburn recommended that the parties in merits and jurisdictional discovery begin a meet-and-confer process to start discussing a deposition schedule. As part of that process, she indicated that the parties should begin to take steps, such as visa approvals and other travel necessities, to ensure that witnesses will be available in a timely manner. Toward that goal, plaintiffs are providing the following *initial* list of persons that the Plaintiffs' Executive Committees anticipate naming as deponents and are asking that the defendants take the steps necessary to ensure these individuals are able to travel and appear to testify.

Individual Defendants

Soliman Buthe
Wael Jelaidan
Yasin Kadi
Abdullah Naseef
Abdullah Obaid
Abdullah Turki
Adnan Basha

Dallah Avco

Omar Bayoumi
Aleb Karli
Alawi Saeed Kamel

WAMY
Abdullah Bin Laden

MWL/IIRO

Moayed Butairy
Ghanam al Harbi
Abdelhamid Mujil
Samir Jameel Radhi
Turki bin Jalawi

In addition to the above-listed witnesses, we also intend to provide you with information to identify witnesses under FRCP 30(b)(6), to allow the entity defendants to begin preparing those witnesses for deposition and start the necessary processes for travel for those witnesses.

To clarify, although we have listed each of the individual defendants separately, we anticipate deposing each of them both in their individual capacities and also as current or former

All Defense counsel per attached list
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representatives of the various entities to which they have been affiliated, with knowledge relevant to the claims against those entities.

Pursuant to the Court's Deposition Protocol Order (ECF No. 3894), paragraph 31, Plaintiffs anticipate noticing these depositions in New York, New York, as one of the Presumptively Acceptable Locations recognized by the Court. To the extent that a witness is unable to enter the United States or some other reason prohibits a witnesses' travel to New York, please advise us as promptly as feasible. In that case, Plaintiffs would alternatively propose that the witness's deposition proceed in London. Regardless of the location, we recommend that the witnesses begin the process to obtain visas to attend the depositions.

Although we are providing this list to start moving this process forward, we note that the depositions related to MWL, IIRO, WAMY and Kadi (including the related individual defendants) are all necessarily subject to the completion of document discovery, including the resolution of pending or planned motions to compel production. Accordingly, Plaintiffs intend to move forward first with the depositions of the Dallah Avco witnesses and Mr. Buthe.

We would appreciate hearing from you as soon as possible on the progress of availability of these witnesses for deposition consistent with the scheduling indicated herein.

Sincerely,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter
SEAN P. CARTER
For the Plaintiffs' Exec. Committees

By: /s/ Robert T. Haebele
ROBERT T. HAEFELE
For the Plaintiffs' Exec. Committees

KREINDLER & KREINDLER

ANDERSON KILL

By: /s/ James P. Kreindler
JAMES P. KREINDLER
For the Plaintiffs' Exec. Committees

By: /s/ Jerry S. Goldman
JERRY S. GOLDMAN
For the Plaintiffs' Exec. Committees

All Defense counsel per attached list
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List of Defense Counsel

Alan Kabat kabat@bernabeipllc.com Bernabei & Kabat, PLLC 1400 16th Street, NW, Suite 500 Washington, DC 20036	Omar Mohammedi omohammedi@otmlaw.com The Law Firm of Omar T. Mohammedi 233 Broadway #801 New York, NY 10279
Martin McMahon mm@martinmcmahonlaw.com Martin F. McMahon & Associates 1150 Connecticut Avenue, N.W., #900 Washington, D.C. 20036	Eric Lewis eric.lewis@lbkmlaw.com Lewis Baach PLLC 1201 F St NW #500 Washington, DC 20004
Robert Kry rkry@mololamken.com MoloLamken LLP 600 New Hampshire Avenue, N.W. Washington, D.C. 20037	Steve Cottreau scottreau@jonesday.com Jones Day 51 Louisiana Avenue, N.W. Washington, D.C. 20001-2113
Peter C. Salerno Amy Rothstein peter.salerno.law@gmail.com amyrothsteinlaw@gmail.com Salerno & Rothstein 221 Schultz Hill Road Pine Plains, NY 12567	